

# **EXHIBIT B**



November 5, 2019

*Via Email and First Class Mail*

Chris Bailey  
Battle Beavers Customs  
3708 Olsen Blvd  
Amarillo, TX 79109  
Chris@battlebeavercustoms.com

Re: On-going Patent Infringement by Battle Beaver Customs

Dear Mr. Bailey:

I previously wrote to you in June 2019 regarding your company's infringement of United State Patent Number 10,188,940 ("the '940 Patent") owned by Scuf Gaming's affiliate Ironburg Inventions Limited (collectively with Scuf Gaming referred to as "SCUF"). In your June 13, 2019 response, you stated that all products that violate the '940 Patent claims have been removed from Battle Beaver Customs' ("Battle Beaver") website when in fact this is not the case and you have additional features that infringe. Contrary to your June 13 response, Battle Beaver continues to advertise, manufacture, and sell game controllers with the "Smart Trigger" feature identified as infringing in my June 2019 letter, as well as game controllers with the separate "Racer Trigger" feature.

Battle Beaver's Smart Triggers are advertised as triggers that "remove the travel time necessary for the button to register an input" and that prevent the trigger from "having to travel all the way down." See <https://battlebeavercustoms.com/blogs/news/smart-triggers-and-bumpers>. Such mechanisms contained within an internal volume of the controller body that adjust and/or reduce the travel of the trigger, like the Smart Trigger, would infringe at least claims 1 and 5 of the '940 Patent.

Similarly, Battle Beaver's Racer Triggers are advertised as "a hybrid between Stock and Smart triggers" with a reduced trigger travel such that the "trigger will move freely from 0-50%" and then stop with an activation. See <https://battlebeavercustoms.com/tools/builder/45>. Like the Smart Trigger, the Racer Trigger mechanism contained within the internal volume of the controller body that adjusts and/or reduces the trigger travel would also infringe at least claims 1 and 5 of the '940 Patent.

Additionally, to the extent that you are selling controllers with either above listed feature in Europe, please be advised of the recent grant of the European counterpart of the '940 Patent, EP3074101, which will be validated shortly in various European countries including the UK, Spain, Germany, and France. Battle Beaver's European sales of products with the Smart Trigger and/or Racer Trigger features will likewise infringe the claims of EP2074101 once validated.

In light of the above, SCUF reiterates its demand that Battle Beaver cease advertising, promoting, manufacturing, selling products that infringe the '940 Patent, including products with the Smart Trigger and/or Racer Trigger features immediately. Additionally, since Battle Beaver seems determined to add features to its products that infringe SCUF's intellectual property, we invite you to review SCUF's patent portfolio listed at <https://scufgaming.com/s/patents> before implementing any additional features on Battle Beaver's products.

As you are no doubt aware, other manufacturers have acknowledged the strength of SCUF's patent portfolio by taking a license. SCUF will not stand by idly in the face of Battle Beaver's on-going, and at this point willful, infringement of our intellectual property. I am available over the next week for a discussion to see if this matter may be resolved. Absent such resolution, SCUF expects Battle Beaver to cease all advertising, manufacturing, and sales of products with the above-identified features by **November 13, 2019**. After that date, SCUF will be forced to turn this matter over to outside counsel for further action.

Sincerely,



**Robert B. Dulaney III** | General Counsel